

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF COLUMBIA)	
GAS OF KENTUCKY, INC. FOR AN)	
ADJUSTMENT OF RATES; APPROVAL OF)	CASE NO.
DEPRECIATION STUDY; APPROVAL OF)	2021-00183
TARIFF REVISIONS; ISSUANCE OF A)	
CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY; AND OTHER RELIEF)	

COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION
TO COLUMBIA GAS OF KENTUCKY, INC

Columbia Gas of Kentucky, Inc. (Columbia Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on October 20, 2021. The Commission directs Columbia Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Columbia Kentucky shall make timely amendment to any prior response if Columbia Kentucky obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Columbia Kentucky fails or refuses to furnish all or part of the requested information, Columbia Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Columbia Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Confirm that the results of Columbia Kentucky's lead/lag study indicate that ratepayers are financing Columbia Kentucky's cash needs in the amount of \$6,942,997. If confirmed, explain why Columbia Kentucky's shareholders should earn a return on the \$6,942,997 financed by ratepayers.

2. Refer to Columbia Kentucky's Response to the Attorney General's First Request for Information Item 204. Provide an explanation of how Columbia Kentucky

determined the amount of association dues specifically tied to lobbying activities removed in its ratemaking adjustment.

3. Refer to the Attorney General's witness David Dittimore's Direct Testimony, pages 17–19. Provide a detailed list of all factors that contribute to Columbia Kentucky's high operation and maintenance expenses relative to its peers.

4. Refer to Columbia Kentucky's Response to Staff's Third Request for Information (Staff's Third Request), Item 3, Attachment B.

a. Provide a breakdown of the proposed \$40,000,000 capital spend specifically attributed to the replacement of bare steel pipe.

b. Provide a breakdown of the proposed \$40,000,000 capital spend specifically attributed to projects associated with the Phase 1 Low Pressure program approved in Commission Case No. 2019-00257.²

c. Provide a breakdown of the proposed \$40,000,000 capital spend specifically attributed to projects not associated with the Phase 1 Low Pressure program approved in Case No. 2019-00257.

5. Refer to Columbia Kentucky's Response to Staff's Third Request, Item 4.

a. Provide a cost/benefit analysis between the use of the In-Line Inspection (ILI) and other Direct Assessment methods for Line DE.

b. Provide the payback period for the ILI investment in Line DE.

c. Refer to Attachment C. Provide support for the evaluation results.

² Case No. 2019-00257, *Electronic Application of Columbia Gas of Kentucky, Inc. for 1) A Declaration That Construction of a Low Pressure System Safety Improvement is an Extension of Its System in the Ordinary Course of Business; 2) In the Alternative, for the Issuance of a Certificate of a Certificate of Public Convenience and Necessity for Such Construction; 3) Approval of an Amendment and Expansion of Its Main Replacement Tariff to Its safety Modification and Replacement Tariff; and 4) Approval to Modify the 2019 AMRP Construction Plan* (Ky. PSC Nov. 7, 2019).

d. Explain if the evaluation results are specific to Line DE, specific to Columbia Kentucky, or specific to NiSource.

6. Refer to Columbia Kentucky's Response to Staff's Fourth Request for Information, Item 6a. For the same proxy group companies and Columbia Kentucky affiliates, and along with the data already given on the return of equity (ROE) component of the Cost Recovery Mechanism, provide also: the docket number, filing date, approval and effective date of the ROE, requested ROE, approved ROE, and whether the ROE and ROE associated with its Cost Recovery Mechanism was the result of a settlement or fully litigated rate case.

7. Provide an analysis regarding the need of a CPCN for the ILI project on Line DE.



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DATED OCT 11 2021

cc: Parties of Record

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